8910-16-19

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A TEXAS EASTERN DIVISION

R. A. RIESS GENERAL MANAGER—ENVIRONMENTAL SERVICES ENVIRONMENTAL 4FF4 RS

August 26, 1988



Mr. Robert L. Orwan, Chief Program Evaluation Pennsylvania Department of Environmental Resources 1 Ararat Blvd. P. O. Box 2063 Harrisburg, PA 17120-2063

RE: Final Source Control Program

Dear Mr. Orwan:

Pursuant to Paragraph 17(b)(ii)(C) of the April 1, 1987, Consent Order and Agreement (Consent Order) between the Commonwealth of Pennsylvania Department of Environmental Resources (DER) and Texas Eastern Transmission Corporation and its division, Texas Eastern Gas Pipeline Company (collectively "Texas Eastern"), Texas Eastern has completed the installation of final source controls at the station sites listed below:

Site	Required In-Service Date	Actual <u>In-Service Date</u>
Wind Ridge (20)	December 31, 1988	July 15, 1988
Marietta (24A)	December 31, 1988	August 2, 1988

This completes the installation of all final source controls required by the Consent Order. By letter dated August 1, 1988, Texas Eastern previously confirmed the installation of final source controls at twelve (12) station sites pursuant to Paragraph 17(b)(ii)(B) of the Consent Order. Final source controls are not required at Uniontown (21), Rockwood (22) and Marietta (24) since no operating facilities exist at these three stations. Moreover, as DER approved previously, Texas Eastern will utilize portable source control facilities like those used at remote pipeline locations at Eagle because that station has only pig launching/receiving facilities.

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Mr. Robert L. Orwan, Chief August 26, 1988 Page 2

In addition to the final source controls required pursuant to the Consent Order, Texas Eastern completed the installation of final source controls at the Bernville Station (Berks County) on August 13, 1988.

Sincerely,

R. A. Riess

RAR/CHL/cp

cc: G. B. Davenport

S. L. Horton

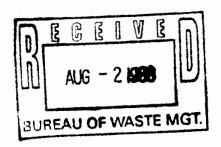
A TEXAS EASTERN DIVISION

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R. A. RIESS GENERAL MANAGER—ENVIRONMENTAL SERVICES ENVIRONMENTAL AFFAIRS

August 1, 1988

Mr. Robert L. Orwan, Chief
Program Evaluation
Pennsylvania Department of
Environmental Resources
1 Ararat Blvd.
P. O. Box 2063
Harrisburg, Pennsylvania 17120-2063



RE: Final Source Control Program

Dear Mr. Orwan:

Pursuant to Paragraph 17(b)(ii)(B) of the April 1, 1987, Consent Order and Agreement between the Commonwealth of Pennsylvania, Department of Environmental Resources and Texas Eastern Transmission Corporation and its division, Texas Eastern Gas Pipeline Company (collectively "Texas Eastern"), Texas Eastern has completed the installation of final source controls at the station sites listed below:

	Required	Actual
Site	<u> In-Service Date</u>	<u> In-Service Date</u>
		·
Entriken	August 1, 1988	June 24, 1988
Perulack	August 1, 1988	July 22, 1988
Shermans Dale	August 1, 1988	May 25, 1988
Bechtelsville	August 1, 1988	May 11, 1988
Armagh	August 1, 1988	July 11, 1988
Delmont	August 1, 1988	July 14, 1988
Grantville	August 1, 1988	May 9, 1988
Connellsville (21A) August 1, 1988	July 29, 1988
Chambersburg	August 1, 1988	June 7, 1988
Holbrook	August 1, 1988	July 19, 1988
Lilly	August 1, 1988	June 1, 1988
Bedford	August 1, 1988	June 15, 1988

In addition, Texas Eastern completed the installation of final source control at the Wind Ridge station site on July 15, 1988.

Mr. Robert L. Orwan August 1, 1988 Page 2

If you should have any questions, please do not hesitate to contact me.

Sincerely,

R. A. Riess

RAR/NAS/cp

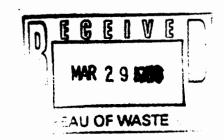
cc: G. B. Davenport

S. L. Horton

A TEXAS EASTERN DIVISION

BARBARA A. CARROLL MANAGER ENVIRONMENTAL PROTECTION

March 22, 1988



a maj

Mr. Robert L. Orwan Chief, Program Evaluation PA Department of Environmental Resources Fulton Bank Building P.O. Box 2063 Harrisburg, PA 17120

Re: Source Control Installations - Consent Order

Dear Bob:

Pursuant to our March 6, 1988 telephone conversation, I am writing to provide you with additional schedule information for the installation work of permanent source control equipment at fifteen (15) Texas Eastern compressor stations. Installation of equipment at the first eleven (11) sites is required by August 1, 1988 and the remaining work at four (4) sites by December 31, 1988. These installations are in compliance with Texas Eastern's April 1, 1987 Consent Order with PA DER.

The following is a list of the stations and the approximate dates for the stating and completion of the installation work.

Station	Start Date	Completion Date
Bechtelsville	March 6	May 7
Grantville	March 7	May 15
Shermans Dale	March 18	May 22
Chambersburg	March 28	May 22
Bedford	April 7	July 15
Entriken	April 25	June 12
Lilly	April 25	June 23
Armagh	May 5	July 7
Delmont	May 16	July 13
Holbrook	May 23	July 12
Perulack	June 13	July 27
Uniontown	May 30	September 21
Wind Ridge	June 6	September 7
Marietta	June 27	September 28
Bernville	July 11	October 12

Mr. Robert L. Orwan March 22, 1988 Page Two

The location for installation of source control equipment was carefully chosen to ensure that construction would have no impact on Exhibit A sampling areas. All locations will be sampled prior to the start of construction. As explained in our conversation, special excavation procedures will be followed at any location where sample results indicate the presence of PCB contamination (0-6"). At these locations, the top 6 to 8 inches will be removed, placed on sheets of plastic, covered with plastic and silt fences erected to prevent erosion and runoff. The excavated area will then be re-sampled and an additional 6-8 inches removed and stockpiled prior to the start of construction.

As work progresses, there may be changes in the schedule; I will notify you of any significant ones. As always, if I can provide any additional information, please do not hesitate to contact me at (713) 759-3764.

Sincerely yours,

Barbara A. Carroll

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BAC/cjg

cc: Mr. Frank Fair, Harrisburg, DER

Mr. Bruce Beither, Norristown, DER

Mr. Tony Orlando, Pittsburgh, DER

8910-16-19

TEXAS EASTERN Gas Pipeline Company

A DIVISION OF TEXAS EASTERN TRANSMISSION CORPORATION

RECEIVED

APR 9 1987

Director's Office
Build of Waste Mgt.

H. D. CHURCH SENIOR VICE PRESIDENT ENGINEERING & OPERATIONS

April 3, 1987

Mr. David C. Batson
Special Litigation Division
Office of Enforcement and Compliance Monitoring (LE-134P)
U. S. Environmental Protection Agency
401 M Street, S.W. (Room NE113)
Washington, D.C. 20460

Dear Mr. Batson:

The enclosed information is submitted by Texas Eastern Gas Pipeline Company (Texas Eastern) in response to a request dated March 13, 1987, signed by Mr. Thomas L. Adams, Jr., Assistant Administrator of the Office of Enforcement and Compliance Monitoring.

In your request, you asked Texas Eastern to provide information about pits used for the disposal, storage, or treatment of wastes. Because much of the information about the pits either was not recorded nor preserved, Texas Eastern largely has relied on interviews with station employees to produce the enclosed information. Although Texas Eastern is continuously attempting to refine this information further, this is the best information currently available. We will inform you promptly if our additional investigations produce information which materially changes these responses.

The items which follow elaborate on or explain some of the information contained on the summary sheets enclosed with this letter.

1. The proximity to residential property was determined from information required by the Department of Transportation (DOT) to be gathered by all pipeline companies. DOT regulations generally require that Texas Eastern determine the number and proximity of residences within one quarter mile on either side of the compressor station milepost and within 660 feet on either side of the pipeline, i.e., a one-half mile by 1320 foot rectangle with the compressor station milepost at its center.

In responding to your request concerning the proximity of the pits to residential property, Texas Eastern has provided the distance to the nearest residential property as identified by the DOT survey. Because the pit locations are not coincident with the compressor stations mileposts, the proximity of the pit to the nearest residential property

- 7. Texas Eastern at times has used landfills for the disposal of domestic solid waste (household-type wastes) at some of its compressor stations. Texas Eastern has no knowledge of nor reason to suspect that any of its domestic solid waste landfills were ever used for the disposal of waste oil, pipeline liquids, or other similar wastes. We, therefore, have not included descriptions of these locations in our responses to your request. If you desire more information about domestic solid waste disposal at Texas Eastern's compressor stations or other facilities, we will be pleased to provide what information we have to you.
- 8. We have not provided any information about pits located at the Corona, New Mexico, Winslow, Arizona, and Seligman, Arizona facilities. These facilities are located on the Transwestern Pipeline Company system which was sold by Texas Eastern in 1984. A condition of that sale was that all files would be turned over to the buyer, Houston Natural Gas, now Enron Corporation.

If you have any questions or require additional information, please advise.

Sincerely,

H. D. Chupch

cc: Mr. Leigh Pegues, Director
Alabama Department of Environmental Management

Dr. Phyllis Garnett, Director Arkansas Department of Pollution Control & Ecology

Mr. Richard Carlson, Director
Illinois Environmental Protection Agency

Ms. Nancy Maloey, Commissioner Indiana Department of Environmental Management

Ms. Mary Helen Miller, Secretary Kentucky Natural Resources & Environmental Protection Cabinet

Ms. Martha Madden, Secretary Louisiana Department of Environmental Quality

Ms. Adele Wilzack, Director Maryland Department of Health & Mental Hygiene

Mr. Charlie L. Blalock, Chief Executive Officer Mississippi Department of Natural Resources

Dr. Frederick Brunner, Director Missouri Department of Natural Resources U.S. ENVIRONMENTAL PROTECTION AGENCY April 3, 1987 Page 4

> Dr. Richard T. Dewling, Commissioner New Jersey Department of Environmental Protection

> Mr. Henry Williams, Commissioner New York Department of Environmental Conservation

Mr. Warren W. Tyler, Director Ohio Environmental Protection Agency

Mr. Donald A. Lazarchik, Director Pennsylvania Department of Environmental Resources

Mr. Tom Tiesler, Director Tennessee Department of Health & Environment

Mr. Ronald R. Potesta, Director West Virginia Department of Natural Resources

Mr. Larry Soward, Executive Director Texas Water Commission

Mr. Jim Morrow Texas Railroad Commission

ROCKWOOD, PA STATION 22

Facility Data

o Latitude: 39° 56' 18" N o Longitude: 79° 06' 12" W

o Proximity to residential property: approximately 260 feet

Pit Data

Number of Pits: One

Pit # PA-22-01

- o Installation/Last Use/Backfilled Dates: Unknown/Unknown/Unknown
- o Approximate Size/Volume: 30 feet in diameter, depth unknown
- o Wastes: Unknown
- o Source of Wastes: Unknown
- o Pit Location: 450 feet S58°E of the SW corner of the 24-inch pipeline building

Driving Directions

From New Centerville, go east on Mud Pike approximately 4.7 miles (past Baltimore and Ohio Railroad and Bando). Turn right at first intersection past Bando. Go south approximately 1/2 mile. Compressor station is on right side of this road.

LEIDY STATION, PA

There were no pits located at this station.

BERNVILLE, PA

There were no pits located at this station.

WIND RIDGE, PA STATION 20

Facility Data

o Latitude: 39° 53' 54" N o Longitude: 80° 23' 55" W

o Proximity of residential property: approximately 133'

Pit Data

Number of Pits: Two

Pit #PA-20-01

- o Installation/Last Use/Backfill Dates: unknown/1979/1982
- o Approximate Size/Volume: Approximately 30 ft x 40 ft x 3 ft deep/3600 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units
- o Pit Location: 455' N O4⁰E of NW corner of old 24" blower building

Pit #PA-20-02

- o Installation/Last Use/Backfill Dates: unknown/1970/1982
- o Approximate Size/Volume: 15 ft x 20 ft x 3 ft deep/900 cubic
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 255' S 42° W of the NW corner of old 24" blower building

Driving Directions

From Waynesburg, PA, proceed west on Hwy. 18 a distance of 6.7 miles. Turn right onto Hwy 21, proceed a distance of 4.0 miles. Turn left onto County Rd. 30003, proceed a distance of 3.0 miles. Turn left at T-intersection, proceed a distance of 1.5 miles. Station is located on left side of road.

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UNIONTOWN, PA STATION 21

Facility Data

o Latitude: 39° 55' 45" N o Longitude: 79° 38' 37" W

o Proximity to residential property: approximately 160 feet

Pit Data

Number of Pits: One

Pit # PA-21-01

- o Installation/Last Use/Backfill Dates: 1943/unknown/prior to 1956
- o Approximate Size/Volume: 30 feet in diameter at surface, depth unknown
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 250 feet S61°E of the northeast corner of the compressor building

Driving Directions

From Uniontown, PA, proceed North on Old Hwy. 119 a distance of 3.8 miles. Turn right on Gaddis Crossroad (State Rt. 26047), go 1.5 miles and turn right at Clover Farm Store. Station is on left.

CONNELLSVILLE. PA STATION 21A

Facility Data

o Latitude: 39° 55' 54" N o Longitude: 79° 40' 18" W

o Proximity to residential property: approximately 416 feet

Pit Data

Number of Pits: Four

Pit # PA-21A-01

- o Installation/Last Use/Backfilled Dates: Unknown/1977/1977
- o Approximate Size/Volume: 10 feet in diameter at bottom, 4 feet deep/ 310 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 465 feet N74°W of the west corner of the compressor building

Pit # PA-21A-02

- o Installation/Last Use/Backfilled Dates: Unknown/1977/1977
- o Approximate Size/Volume: 10 feet in diameter at bottom, 4 feet deep/ 310 cubic feet
- o Wastes: Pipeline liquid
- o Source of Wastes: Pipeline and drips from units o Pit Location: 465 feet N74 W of the west corner of the compressor building

Pit # PA-21A-03

- o Installation/Last Use/Backfilled Dates: Unknown/1977/1977
- o Approximate Size/Volume: 37 feet x 25 feet x 6 feet deep/ 5550 cubic feet
- o Wastes: Pipeline liquid
- o Source of Wastes: Pipeline and drips from units
- o Pit Location: 560 feet N15°E of the west corner of the compressor building

Pit # PA-21A-04

- o Installation/Last Use/Backfilled Dates: Unknown/1977/1977
- o Approximate Size/Volume: 37 feet x 25 feet x 6 feet deep/ 5550 cubic feet
- o Wastes: Pipeline liquid
- o Source of Wastes: Pipeline and drips from units
 o Pit Location: 560 feet N15°E of the west corner of the
 compressor building

Driving Directions

From Uniontown, PA, proceed North on Old Hwy. 119 a distance of 3.7 miles. Station is located on left side of road.

BEDFORD, PA STATION 22A

Facility Data

o Latitude: 39° 55' 46" N o Longitude: 78° 35' 14" W

o Proximity to residential property: approximately 355 feet

Pit Data

Number of Pits: One

Pit # PA-22A-01

- o Installation/Last Use/Backfilled Dates: 1952/1970/1979
- o Approximate Size/Volume: 35 feet in diameter, 18 feet deep/ 17300 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 225 feet N53°E of the NE corner of the
- . compressor building

Driving Directions

From Bedford, PA, take Hwy. 220 South 8.6 miles. Station is on right.

CHAMBERSBURG, PA STATION 23

Facility Data

o Latitude: 39° 53' 30" N o Longitude: 77° 40' 49" W

o Proximity to residential property: approximately 200 feet

Pit Data

Number of Pits: one

Pit # PA-23-01

- o Installation/Last Use/Backfilled Dates: 1953/1985/1985
- o Approximate Size/Volume: 30 feet in diameter, 8 feet deep/ 5650 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units
- o Pit Location: Approximately 455 feet N11°E of the NW corner of the compressor building control room.

Driving Directions

From Chambersburg city limits, take Hwy. 11 South 3.4 miles to station on right of highway (0.5 miles from Guilford Springs).

MARIETTA, PA STATION 24

Facility Data

o Latitude: 40° 03' 49" N o Longitude: 76° 36' 04" W

o Proximity to residential property: approximately 140 feet

Pit Data

Number of Pits: One

Pit # PA-24-01

- o Installation/Last Use/Backfilled Dates: Unknown/Unknown/ 1952
- o Approximate Size/Volume: 30-50 feet in diameter, 7 feet deep/8790 cubic feet
- o Wastes: Unknown
- o Source of Wastes: Unknown
- o Pit Location: 265 feet S69°W of the NW corner of the 24-inch crude pipeline building

Driving Directions

From the intersection of hwys 743 and 441 west of Marietta, continue west on Hwy. 441 for 3.7 miles (1.7 miles past Station 24A entrance). Turn left at major intersection of road from Maytown. Station 24 is about 0.1 miles on left.

MARIETTA, PA STATION 24A

Facility Data

o Latitude: 40° 03' 47" N o Longitude: 76° 34' 39" W

o Proximity to residential property: approximately 485 feet

Pit Data

Number of Pits: One

Pit # PA-24A-01

- o Installation/Last Use/Backfilled Dates: 1952/1977/1978
- o Approximate Size/Volume: 50 feet in diameter, 6 feet deep/11,775 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 445 feet N55°E of the NE corner of the compressor building

Driving Directions

From the intersection of Hwys. 743 and 441 west of Marietta, continue west on Hwy. 441 for 2 miles to Station 24A entrance.

EAGLE (PHOENIXVILLE) STATION, PA STATION 25

Facility Data:

o Latitude: 40° 05' 50" N o Longitude: 75° 41' 14" W

o Proximity to residential property: approximately 1109'

Pit Data

Number of Pits: Two

Pit #PA-25-01 NOTE: This pit may actually be a WEP concrete sump which was filled in with dirt and a shed was

later built over it.

o Installation/Last Use/Backfill Dates: unknown/unknown/unknown

o Approximate Size/Volume: unknown/unknown

o Wastes: unknown

o Source of Wastes: unknown

o Pit Location: 175' N 28° W of NW corner of 24" pipeline crude building

Pit #PA-25-02 Fire training pit

- o Installation/Last Use/Backfill Dates: prior to 1947/1979/ 1985
- o Approximate Size/Volume: 30-40 feet in diameter and 2-3 feet deep/1400-3700 cubic feet
- o Wastes: pipeline liquids, gasoline and diesel
- o Source of Wastes: pipeline and fire training
- o Pit Location: 480' N 150 E of NE corner of 24" pipeline crude building

Driving Directions

From Eagle, PA take Pottstown Pike north approximately 1 mile to Fellowship Road. Turn right and go approximately 0.5 miles to the station.

ARMAGH STATION, PA

Facility Data

o Latitude: 40° 25' 51" N o Longitude: 79° 05' 05" W

o Proximity to residential property: approximately 675 feet

Pit Data

Number of Pits: Two

Pit # PA-ARM-01

- o Installation/Last Use/Backfilled Dates: 1958/1982/1982
- o Approximate Size/Volume: 20 feet in diameter at bottom, depth unknown
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units
- o Pit Location: Approximately 635 feet N62°E of the SW corner of the compressor building.

Pit # PA-ARM-02

- o Installation/Last Use/Backfilled Dates: 1958/1969/1969
- o Approximate Size/Volume: 10 feet in diameter, depth unknown
- o Wastes: valve operator oil
- o Source of Wastes: valve operator drips and drainage
- o Pit Location: Approximately 560 feet S35°E of the SW corner of the compressor building.

Driving Directions

From Armagh, PA, take Hwy. 22 West to Clyde, then 0.4 mile to T 716 road. Turn left and go 0.3 mile to fork, take T 714 to right and continue 0.7 mile to station.

BECHTELSVILLE STATION, PA

Facility Data

o Latitude: 40° 25' 06" N o Longitude: 75° 37' 22" W

o Proximity of residential property: approximately 634'

Pit Data

Number of Pits: One

Pit #PA-BEC-01

o Installation/Last use/Backfill Dates: 1957/1967/1968

o Approximate size/Volume: 20 - 50 feet in diameter, depth estimated to be 5 ft./1500 cubic feet

o Wastes: Pipeline liquids and engine oil

o Source of Wastes: Pipeline and drips from units o Pit Location: 255' S 81° E of NE corner of compressor building

Driving Directions

From Pottstown, go north on State Route 100 approximately 10.8 miles to Shultzville. Turn left at Shultzville intersection and go 0.6 miles to next intersection. Turn right and go 1/4 mile to next intersection. Turn left and follow this road for approximately 1.7 miles. Station is on the left.

DELMONT STATION, PA

Facility Data

o Latitude: 40° 23' 04" N o Longitude: 79° 32' 51" W

o Proximity to residential property: approximately 584'

Pit Data

Number of Pits: One

Pit #PA-DEL-01

- o Installation/Last Used/Backfill Dates: unknown/1972/1975
- o Approximate size/Volume: 30 feet in diameter/volume unknown o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units
- o Pit Location: approximately 535' S 71° W of the SW corner of the reciprocating compressor building

Driving Directions

Take Hwy 66 N out of Greensburg 6.5 miles from Otterman Street. Turn right on paved road at steel tower, then take next right turn 0.4 miles ahead. Proceed 1.1 miles to station.

ENTRIKEN STATION, PA

Facility Data

o Latitude: 40° 18' 32" N o Longitude: 78° 08' 21" W

o Proximity to residential property: There are no residences within 660 feet of the facility milepost.

Pit Data

Number of Pits: One

Pit # PA-ENT-01

- o Installation/Last Use/Backfilled Dates: Unknown/1965/1965 o Approximate Size/Volume: 10 feet in diameter, depth unknown
- o Wastes: Valve operator oil

o Source of Wastes: Valve operator

o Pit Location: Approximately 235 feet S12⁰W of the SW corner of the compressor building

Driving Directions

From Entriken, take Hwy. 994 east 4.5 miles, turn left on paved road (T-381) to Trough Creek State Park. Station is 0.7 miles ahead.

GRANTVILLE STATION, PA

Facility Data

o Latitude: 40° 22' 47" N o Longitude: 76° 40' 16" W

o Proximity to residential property: approximately 500 feet

Pit Data

Number of Pits: One

Pit # PA-GRA-01

- o Installation/Last Use/Backfilled Dates: 1955/1977/1977
- o Approximate Size/Volume: 20 feet in diameter at bottom, 3-4 feet deep/ 1260 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 440 feet S81°W of the SW corner of the compressor building

Driving Directions

From Hershey, go north on State Route 743 approximately 10 miles to Interstate 81. Cross interstate and continue approximately 0.2 miles. turn left into compressor station.

HOLBROOK STATION, PA

Facility Data

1

o Latitude: 39° 53' 26" N o Longitude: 80° 27' 08" W

o Proximity to residential property: approximately 485 feet

Pit Data

Number of Pits: Three

Pit # PA-HOL-01

- o Installation/Last Use/Backfilled Dates: Unknown/1974/1980
- o Approximate Size/Volume: 15 feet in diameter, 2 feet deep/ 350 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 510 feet N28°E of the NW corner of the compressor building pump room.

Pit # PA-HOL-02 (NOTE: This pit is concrete-lined)

- o Installation/Last Use/Backfilled Dates: Unknown/1968/1980
- o Approximate Size/Volume: 40 feet in diameter, 2 feet deep/ 1920 cubic feet
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 420 feet 866°W of the NW corner of the compressor building A pump room.

Pit # PA-HOL-03

- o Installation/Last Use/Backfilled Dates: Unknown/1968/1980
- o Approximate Size/Volume: 15-20 feet in diameter, depth unknown
- o Wastes: pipeline liquids and engine oil
- o Source of Wastes: pipeline and drips from units o Pit Location: 410 feet S88 W of the NW corner of the compressor building pump room.

Driving Directions

From Wind Ridge, take Hwy. 21 West about 2 miles and turn left on paved road to Ryerson State Park. Station is approximately 1 mile ahead.

LILLY STATION, PA

Facility Data:

o Latitude: 40° 26' 16" N o Longitude: 78° 35' 33" W

o Proximity to residential property: approximately 477'

Pit Data

Number of Pits: One

Pit #PA-LIL-01

o Installation/Last Use/Backfill Dates: 1957/1977/1977

o Approximate Size/Volume: 25 feet in diameter at surface and 5 feet deep/2453 cubic feet

o Wastes: pipeline liquids and engine oil

o Source of Wastes: pipeline and fire training o Pit Location: 250' N 63° W of NW corner of compressor building

Driving Directions

From Cresson, go east on U.S. Route 22 approximately 1 mile to Summit. Turn right at Summit, proceed 0.9 miles south. Turn left at intersection, proceed 0.6 miles. Turn right at intersection, proceed 0.3 miles. Station is located on right side of road.

PERULACK STATION, PA

Facility Data

o Latitude: 40° 21' 15" N o Longitude: 77° 39' 16" W

o Proximity to residential property: approximately 420 feet

Pit Data

Number of Pits: Two

Pit # PA-PER-01

- o Installation/Last Use/Backfilled Dates: Unknown/1977/1978
- o Approximate Size/Volume: 20-25 feet in diameter, depth unknown
- o Wastes: Pipeline liquids and engine oil
- o Source of Wastes: Pipeline and drips from units o Pit Location: 605 feet S60°E of the NW corner of the compressor building

Pit # PA-PER-02

- o Installation/Last Use/Backfilled Dates: Unknown/1977/1978
- o Approximate Size/Volume: 20-25 feet in diameter, depth unknown
- o Wastes: Pipeline liquids
- o Source of Wastes: Pipeline o Pit Location: 335 feet S87 W of the NW corner of the compressor building

Driving Directions

From East Waterford, go south on State Route 75 approximately 2.7 miles to Perulack. Turn right at Perulack and go approximately 0.9 miles. Compressor Station is on left side.

SHERMANS DALE STATION, PA

Facility Data

o Latitude: 40° 20' 38" N o Longitude: 77° 09' 46" W

o Proximity to residential property: approximately 710 feet

Pit Data

Number of Pits: Two

Pit # PA-SHE-01

- o Installation/Last Use/Backfilled Dates: 1958/1968/1968
- o Approximate Size/Volume: 30 feet in diameter at surface, depth unknown
- o Wastes: Pipeline liquid
- o Source of Wastes: Pipeline and drips from units o Pit Location: 235 feet N15°E of the NE corner of the compressor building

Pit # PA-SHE-02

- o Installation/Last Use/Backfilled Dates: 1968/1981/1981
- o Approximate Size/Volume: 20 feet in diameter, depth unknown
- o Wastes: Pipeline liquid
- o Source of Wastes: Pipeline and drips from units
- o Pit Location: 410 feet N66°E of the NE corner of the compressor building

Driving Directions

From New Bloomfield, go south on State Route 34 approximately 6 miles. Turn left onto L.R. 5044 and follow, bearing to the right, for approximately 1.5 miles. Compressor station will be on right side of road.

Feli Committee + Anal 13

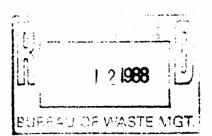
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A DIVISION OF TEXAS EASTERN TRANSMISSION CORPORATION

R. A. RIESS
GENERAL MANAGER—ENVIRONMENTAL SERVICES
ENVIRONMENTAL AFFAIRS

October 10, 1988

Mr. Robert L. Orwan Chief of Program Evaluation Pennsylvania Department of Environmental Resources One Ararat Boulevard P. O. Box 2063 Harrisburg, Pennsylvania 17120-2063



Re: Justification to Eliminate Non-PCB Sampling and Analysis of Surface Soil Samples at the Pennsylvania Sites

Dear Mr. Orwan:

In response to Condition 2 of the Department's letter dated August 11, 1988 which approved the June 20, 1988 "Plan for the Phase II Surface Soil and Sediment Sampling Program at the Pennsylvania Sites", Texas Eastern Transmission Corporation and Texas Eastern Gas Pipeline Company ("Texas Eastern") hereby submits the attached data analysis which confirms Texas Eastern's conclusion that there is no further need to continue sampling and analysis of non-PCB substances in surface soils at the Pennsylvania Sites. This analysis is a follow-up to discussions at a meeting with the Department on August 4, 1988. At this meeting, the Department indicated that it agreed with that conclusion.

Reference is made to the letter dated September 21, 1987 from Wolf, Block, Schorr and Solis-Cohen to the Department which addressed a modification to the April 1, 1987 Consent Order whereby Phase I sampling for Hazardous Substance List (HSL) compounds in onsite surface soils was reduced in scope, but would be sufficient to indicate whether or not HSL compounds other than PCB were to be considered compounds of concern at the Pennsylvania Sites. The Department concurred at that time with Texas Eastern's proposal.

The attached data analysis clearly shows that (i) PCBs are the parameter of concern at the Pennsylvania Sites, and (ii) future site remediation for PCBs

Mr. Robert L. Orwan October 10, 1988

Page 2



will remediate the low level non-PCB \mbox{HSL} compounds present in the surface soils at the Pennsylvania \mbox{Sites} .

If there are any questions regarding this matter, please advise.

Very truly yours,

R. A. Riess

RAR/DTP:gp Attachment

orwan.ltr

HSL DATA ANALYSIS

In compliance with the April 1, 1987 Consent Order, Texas Eastern conducted a Phase I surface soil and sediment sampling program for the Pennsylvania Sites from October 1987 through February 1988. The results of the Phase I surface soil investigations for each of the Pennsylvania Sites were summarized and submitted to the Department between December 14, 1987 and April 1, 1988.

By agreement between Texas Eastern and the Department as part of the Phase I program for onsite surface soils, Texas Eastern collected and analyzed samples for certain non-PCB U.S. EPA Hazardous Substance List ("HSL") organic compounds. These compounds consisted of volatile organic compounds ("VOCs") and semivolatiles organic compounds (also referred to as base neutral, and acid extractable compounds or "BNA" compounds). The plan for the HSL sampling and analysis performed during the Phase I soil sampling is described in a letter dated September 21, 1987 from Wolf, Block, Schorr and Solis-Cohen to the Department. The HSL characterization program set forth in this plan, and subsequently conducted under Phase I of the onsite surface soil sampling program, produced meaningful and representative data which satisfied the Department's objectives for site characterization. A substantial body of HSL data, consistent in magnitude with the HSL database for the groundwater and pit boring programs, has been developed for onsite surface soils at the Pennsylvania sites.

HSL characterization under the Phase I soil sampling program consisted of the following activities. One discrete sample was collected from a single grid point in each Exhibit A area for analysis of VOCs. One composite sample was collected from the various grid points (typically 16 points) forming each Exhibit A area for analysis of BNAs. In addition, discrete samples were collected from each grid point in each Exhibit A area for analysis of PCBs. A total of 149 Exhibit A areas were characterized for HSL substances at 17 Pennsylvania Sites during the Phase I soil sampling program. (No onsite sampling was conducted at the Marietta (24) site since no Exhibit A areas were identified at this site.)

DISCUSSION

Analysis of the Phase I soil sampling results is directed toward defining the overall trends regarding the nature of the substances found during the onsite surface soil sampling program at the Pennsylvania Sites. The conclusions drawn consider all of the Phase I data for the Pennsylvania Sites.

Tables 1 to 3 summarize the HSL compounds detected in the Phase I onsite surface soil samples at the Pennsylvania Sites. Values for total PCB, BTXE, total VOC, and total BNA are presented in these tables. Total PCB represents the sum of the concentrations of seven HSL Aroclors. BTXE represents the sum of the concentrations of benzene, toluene, xylenes (total), and ethylbenzene. Total VOC

represents the sum of the concentrations of the HSL volatile compounds. Total BNAs represents the sum of the concentrations of the HSL semivolatile compounds, excluding phthalates. Phthalates were not included in the sum for total BNA since these compounds are often used as plasticizers and, as such, are common laboratory and field contaminants. For purposes of calculating total PCB, BTXE, total VOC, and total BNA, compounds not detected were assumed to have concentrations equal to zero.

PCB COMPOUNDS

Table 1 summarizes the total PCB data for the Phase I onsite surface soil samples. PCBs were detected in approximately 58 percent of the 3,890 samples collected. For samples where PCBs were detected, the average concentration of total PCB was 290 ppm.

VOLATILE ORGANIC COMPOUNDS

Due to their volatile nature, VOCs were not expected to be found extensively in surface soils at the Pennsylvania Sites. The Phase I surface soil data presented in Table 2 support this assertion. At six of the 17 Pennsylvania Sites characterized for HSLs (Chambersburg, Connellsville (21A), Lilly, Marietta (24A), Rockwood, and Wind Ridge), VOCs were not found above detection limits in the onsite surface soil samples collected. VOCs were detected in 18 percent of the Phase I surface soil samples. Total VOC concentrations in onsite surface soils were less than 1 ppm for all samples analyzed. Additionally, approximately 70 percent of the detected samples indicated total VOC concentrations less than 0.01 ppm. Based on their limited presence and low concentrations when detected, VOCs are not potential compounds of concern in onsite surface soils at the Pennsylvania Sites.

SEMIVOLATILE ORGANIC COMPOUNDS

Phase I surface soil data for semivolatile organic compounds are summarized in Table 3. Total detected BNA concentrations ranged from 0.41 to 117 ppm. No BNA compounds were detected in the surface soil samples collected at two of the 17 Pennsylvania Sites characterized for HSLs (Rockwood and Wind Ridge). As illustrated in Figure 1, over 60 percent of the surface soil samples had total BNA concentrations below detectable levels. Approximately 25 percent of the remaining samples had total BNA concentrations less than 10 ppm. Only one surface soil sample out of the 149 samples taken had a total BNA concentration greater than 100 ppm. The corresponding average PCB concentration for this sample was over 200 ppm. The average concentration for detected values of total BNAs was approximately 18 ppm. The plot of cumulative percent versus total BNA concentration, provided in Figure 2, shows that approximately 96 percent of the samples have total BNA concentrations less than 50 ppm and approximately 80 percent of the samples have total BNA concentrations less than 5 ppm.

In the analysis of pipeline liquids samples taken pursuant to Paragraph 13 of the April 1, 1987 Consent Order and submitted to the Department on June 1, 1987, it was shown that BNAs are not major constituents of pipeline liquids. The Phase I data indicate that pipeline liquids are not the likely source of BNAs in surface soils. Potential sources of BNAs at the Pennsylvania Sites are lubricants, greases, and asphalt

since BNAs are constituents of these materials. These products, however, are commonly used for maintenance and construction purposes, with low concentration of BNAs readily found in soils near such activity. The concentrations found at the Pennsylvania Sites are not unusual from that found at any similar facility where maintenance and construction are on-going.

COMPARISON OF PCB AND BNA DATA

A comparison of the average total PCB concentrations for the individual grid points used to gather the composite BNA sample for an Exhibit A area with the total BNA concentrations found in those samples is summarized in Table 4.

In approximately 80 percent of the Phase I samples of onsite soils, average total PCB concentrations were greater than total BNA concentrations. Of these samples, greater than 50 percent showed average total PCB concentrations at least an order of magnitude higher than the total BNA concentrations.

CONCLUSIONS

Based on the overall data trends for the approximately 3,900 onsite surface soil samples collected during the Phase I surface soil program at the Pennsylvania sites, the following conclusions are reached:

- o PCBs were found at the greatest frequencies and concentrations in the surface soils associated with Exhibit A areas.
- o VOCs were not generally detected in the Phase I surface soils and, when they were detected, they were found at insignificant concentrations (generally in the parts per billion range).
- o BNAs were not detected in the majority of the Phase I surface soils. When present, BNAs were typically found at concentrations below 5 ppm.
- o The presence and concentration of PCBs in onsite surface soils were significantly greater than the presence and concentration of other HSL compounds (VOCs and BNAs). The appropriate parameter for indicating potential areas of remediation for surface soils is PCBs. Moreover, site remediation for PCBs will also remove the low levels of non-PCB HSL compounds found in surface soil samples at the Pennsylvania Sites.

RECOMMENDATIONS

Based on the Phase I surface soil data and analysis presented above, it is recommended that no further sampling and analysis for compounds other than PCBs be conducted as part of the surface soil assessment program at the Pennsylvania Sites.

Table 1

PCB Compounds Detected in the Phase I Onsite Surface Soil

Sampling Program at the Pennsylvania Sites

	Number of	Number of Samples (2)	Percent of Detects	Range and Average Concentration of Detected Values		
Compound	Detects (1)			Minimum (ppm)	Maximum (ppm)	Average (ppm)
PCBs						
Total PCB(3)	2254	3890	57.9	0.089	230000	290

⁽¹⁾ Detects include all concentration values except those designated as ND (not detected), J (estimated value below the minimum quantitation limit), and B (present in blank).

⁽²⁾ Samples include routine or duplicate samples. At locations where routine and duplicate samples were collected, the highest concentration value was used.

⁽³⁾ Total PCB represents the sum of the concentrations of the seven HSL Aroclors for each sample. Compounds not detected are assumed to have concentrations equal to zero.

Table 2

Volatile Compounds Detected in the Phase I Onsite Surface
Soil Sampling Program at the Pennsylvania Sites

	of C Detects Sam	Number	of Percent amples of	Range and Average Concentration of Detected Values		
Compound		Samples (2)		Minimum (ppm)	Maximum (ppm)	Average (ppm)
VOLATILES						
1,1,1-Trichloroethane	2	150	1.3	0.008	0.018	0.013
2-Butanone	9	150	6.0	0.014	0.320	0.093
2-Hexanone	1	150	0.7	0.031	0.031	0.031
Acetone	8	150	5.3	0.020	0.200	0.065
Carbon Disulfide	4	150	2.7	0.006	0.017	0.009
Methylene Chloride	1	150	0.7	0.048	0.048	0.048
Tetrachloroethene	1	150	0.7	0.014	0.014	0.014
Toluene	4	150	2.7	0.006	0.013	0.008
BTXE(3)	4	150	2.7	0.006	0.013	0.008
Total VOC(4)	27	150	18.0	0.006	0.320	0.057

⁽¹⁾ Detects include all concentration values except those designated as ND (not detected), J (estimated value below the minimum quantitation limit), and B (present in blank).

⁽²⁾ Samples include routine or duplicate samples. At locations where routine and duplicate samples were collected, the highest concentration value was used.

⁽³⁾ BTXE represents the sum of the concentrations of benzene, toluene, xylenes (total) and ethylbenzene for each sample. Compounds not detected are assumed to have concentrations equal to zero.

⁽⁴⁾ Total VOC represents the sum of the concentrations of the HSL volatile compounds for each sample. Compounds not detected are assumed to have concentrations equal to zero.

Table 3

Semivolatile Compounds Detected in the Phase I Onsite Surface Soil Sampling Program at the Pennsylvania Sites

	Number of	Number of	er Percent	-	Average Con Detected Va	
	Detects	Samples	of	Minimum	Maximum	Average
Compound	(1)	(2)	Detects	(ppm)	(ppm)	(ppm)
SEMIVOLATILES						
1,2,4-Trichlorobenzene	1	149	0.7	1.40	1.40	1.40
1,2-Dichlorobenzene	1	149	0.7	3.00	3.00	3.00
2-Methylnaphthalene	1	149	0.7	0.85	0.85	0.85
4-Methylphenol	1	149	0.7	0.40	0.40	0.40
Acenaphthene	10	149	6.7	0.37	4.50	1.15
Anthracene	14	149	9.4	0.41	6.80	1.78
Benzo(A)Anthracene	30	149	20.1	0.43	12.00	2.62
Benzo(A)Pyrene	26	149	17.4	0.34	9.20	2.37
Benzo(B)Fluoranthene	29	149	19.5	0.38	19.00	2.80
Benzo(G,H,I)Perylene	15	149	10.1	0.39	4.80	1.36
Benzo(K)Fluoranthene	18	149	12.1	0.36	9.20	2.02
Bis(2-Ethylhexyl)Phthalate	5	149	3.4	0.40	1.60	0.78
Chrysene	28	149	18.8	0.41	16.00	2.78
Dibenz(A,H)Anthracene	3	149	2.0	0.45	0.66	0.55
Dibenzofuran	6	149	4.0	0.37	3.30	1.14
Fluoranthene	50	149	33.6	0.41	28.00	3.88
Fluoren e	12	149	8.1	0.34	4.60	1.33
Indeno(1,2,3-Cd)Pyrene	16	149	10.7	0.48	4.90	1.57
Naphthalene	1	149	0.7	1.80	1.80	1.80
Pentachlorophenol	1	149	0.7	3.20	3.20	3.20
Phenanthrene	38	149	25.5	0.41	26.40	3.81
Phenol	7	149	4.7	0.73	30.00	9.50
Pyrene	48	149	32.2	0.40	27.00	3.66
Total BNA(3)	58	149	38.9	0.41	116.70	17.82

⁽¹⁾ Detects include all concentrations values except those designated as ND (not detected), J (estimated value below the minimum quantitation limit), and B (present in blank).

⁽²⁾ Samples include routine or duplicate samples. At locations where routine and duplicate samples were collected, the highest concentration value was used.

⁽³⁾ Total BNA represents the sum of the concentrations of the HSL semivolatile compounds (excluding phthalates) for each sample. Compounds not detected are assumed to have concentrations equal to zero.

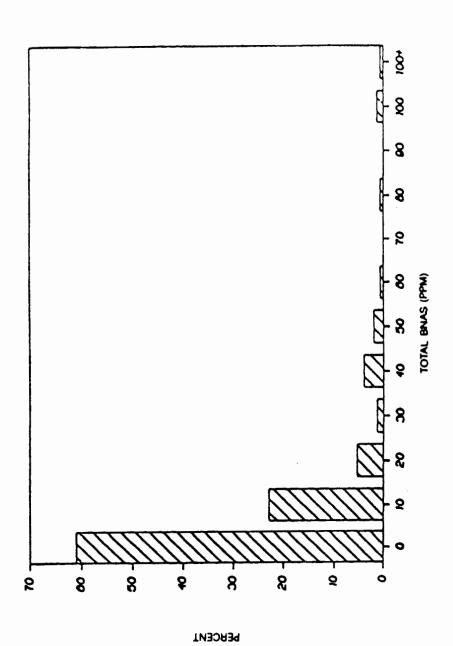
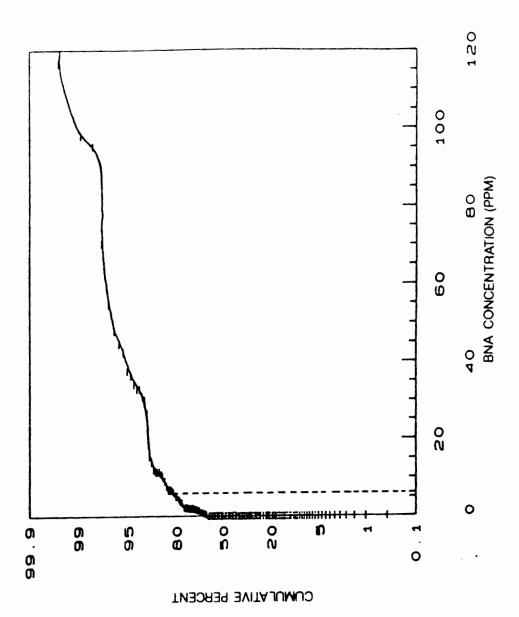


FIGURE 1. BNA FREQUENCY AND PERCENT DISTRIBUTION IN PHASE I SOIL SAMPLES



-7-

(Mine)

Table 4

Summary of BNA and PCB Data for the Phase I Onsite Surface Soil Sampling Program at the Pennsylvania Sites

		Total	Average	Maximum
		BNA	Total PCB	Total PCB
Site	Grid Location	(ppm)	(ppm)	(ppm)
Armagh	A52I	ND	171	1,880
•	A53J	ND	469	3,850
	A54J	4.0	483	3,850
	A55N	10	1,288	10,700
	A56I	ND	346	3,850
	A57E	ND	180	1,390
	A59M	ND	90	1,070
	A60K	ND	87	1,070
	B52B	ND	65	150
	C52K	15	2,148	10,000
	C54I	ND	690	4,900
	C54L	ND	730	4,900
	C55K	ND	571	4,900
Bechtelsville	A52K	ND	0.1	1.1
	A54M	ND	2.6	26
	B51N	2.0	1.8	18
	C52R	ND	6.7	30
	D52S	ND	950	4,000
	D54S	1.2	1,170	4,000
	D55U	ND	345	1,500
Bedford	A51J	0.8	20	140
	A54F	1.9	ND	<1
	BSIL	2.1	0.2	1.9
	C2iI	ND	0.4	7.2
	Ď510	ND	ND	0.9
	E51Q	ND	4.0	22
	F52R	ND	8.5	27
	G51L	ND	1.1	9.5

Table 4 (continued)

Site	Grid Location	Total BNA (ppm)	Average Total PCB (ppm)	Maximum Total PCB (ppm)
Chambersburg	A51H	11	3.1	27
Chambersburg	B52L	ND	0.2	3.0
	C51R	9.1	3.3	46
	C53P	9.1 95	3.1	46
	D52Q	0.6	2.7	18
Connellsville	A52Q	6.7	3.0	47
	A52M	6.8	0.1	1.3
	B51N	37	22	150
	B52K	44	83	700
	B56N	2.2	160	1,100
	C510	1.4	7.0	68
	D48K	6.5	72	980
	D52J	ND	160	800
	D53H	ND	9.8	140
Delmont	A52G	3.3	1.8	28
	B52K	33	0.4	4.6
	B550	1.9	0.1	1.4
	D52F	ND	91	460
	D51K	ND	8.4	51
	D51 S	ND	5.7	37
	D53H	ND	58	630
	D54L	ND	1.0	9.2
	G51I	12	97	750
. •	H52N	ND	92	440

Table 4 (continued)

		Total	Average	Maximum
		BNA	Total PCB	Total PCE
Site	Grid Location	(ppm)	(ppm)	(ppm)
Eagle	A510	7.7	0.3	1.9
	B52N	5.1	0.7	5.2
	B56N	12	17	120
	C52N	3.5	230	2,500
	C 52Q	120	220	2,500
	C53L	70	86	1,200
Entriken	A50L	ND	220	756
	A52J	ND	20	158
	A53E	ND	18	165
	A54G	ND	16	52
	B51G	ND	12	5.8
	C51L	ND	3.0	20
	D51H	1.6	15	140
	E51F	ND	60	780
	F54E	ND	8.5	46
	F55D	1.8	3.9	8.8
	F55E	11	4.1	9.0
	F58E	ND	5.7	22
Grantville	A52H	5.2	1.8	7.1
	B52Q	ND	590	7,100
	C520	ND	3.1	19
	D51H	ND	14	200
	E51M	0.5	8.0	20
	E54M	0.4	95	280
. •	E58L	26	17	89
	F53N	30	670	2,000
	G510	ND	14	74
	H51N	ND	4.1	21

Table 4 (continued)

		Total BNA	Average Total PCB	Maximum Total PCB
Site	Grid Location	(ppm)	(ppm)	(ppm)
Holbrook	A57I	ND	7.8	61
	B52R	ND	96	790
	C 51 0	ND	260	3,200
	D52K	ND	ND	∢1
	E51Q	ND	1	5.6
	E52M	31	ND	<1
	F51N	ND	1	7.2
	G 52 J	0.7	8.6	47
	H51N	ND	0.8	6.2
	H51R	1.9	9.8	55
	151J	1.4	120	560
Lilly	A52S	ND	1.7	17
-	B52N	ND	0.4	4.2
	C52J	ND	0.2	2.2
	С53Н	ND	4.9	50
	C5 4 J	ND	19	250
	C55 E	ND	1,200	6,300
	C56J	ND	29	250
	C57C	2.0	320	3,600
	C58I	ND	70	390
	C60G	ND	13	81
	C61B	ND	910	12,000
	C62L	ND	1.6	6.6
	D51L	98	0.5	4.0
	E510	ND	1.6	21

Table 4 (continued)

		Total BNA	Average	Maximum Total DCB
C:La	Grid Location		Total PCB	Total PCE
Site	Grid Location	(ppm)	(ppm)	(ppm)
Marietta (24A)	А52Н	ND	ND	<1
	B53F	ND	ND	∢1
	B53I	ND	ND	<1
	C52H	ND	8.9	47
	D52L	11	200	2,400
Perulack	A510	ND	1.0	13
	A54N	ND	1.2	7.8
	B52K	ND	9.3	109
	C520	ND	25	260
	D 51H	ND	1,220	19,000
	E52G	ND	2.8	36
	E53F	ND	4.7	36
	F52M	5.7	0.5	4.1
	F53M	33	0.5	4.1
	G51N	ND	0.6	6.6
Rockwood	A51T	ND	ND	ND

Table 4 (continued)

Brook.

		Total	Average	Maximum
		BNA	Total PCB	Total PCE
Site	Grid Location	(ppm)	(ppm)	(ppm)
Shermans Dale	A51X	ND	1.3	8.1
	B51L	42	4.7	21
	B52M	0.9	3.5	21
	B52N	14	2.3	8.6
	B53L	48	12	78
	C52I	34	14	41
	D52B	ND	1.3	3.6
	E52J	1.9	1,120	6,700
	F52 F	ND	82	1,100
	F53C	ND	9.7	43
	F55C	ND	7.7	65
	G52T	ND	ND	<1
	G57S	ND	1.2	8.5
	G58R	ND	6.2	73
	G61R	ND	20,076	230,000
	G61T	ND	149	8,100
	G62T	ND	149	8,100
Jniont ow n	A52I	2.3	26	330
	B51L	2.1	ND	ND
	C51I	6.7	10	93
	D52N	4.6	1.1	5.8
	E51S	36	11	53
	F52R	55	10	33
Vind Ridge	A51V	ND	22	160
	B51R	ND	5.6	34
	B550	ND	14	149
	B57S	ND	5.3	75
	C51R	ND	2.2	13

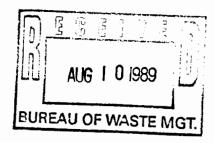
8910-16-19 TE: Identitied Area Hoyran Trash P.t. etc

⊘ Texas Eastern Gas Pipeline Company

A DIVISION OF TEXAS EASTERN TRANSMISSION CORPORATION

August 8, 1989

Mr. Robert L. Orwan
Division of Special Investigations
Bureau of Waste Management
Pennsylvania Department of Environmental Resources
3rd and Locust Streets
18th Floor, Fulton Building
P. O. Box 2063
Harrisburg, PA 17102



RE: IDENTIFIED AREA PROGRAM - PHASE II

Dear Mr. Orwan:

Texas Eastern Transmission Corporation through its Texas Eastern Gas Pipeline Company division ("Texas Eastern") is nearing the completion of the initial phase of its investigation and characterization of identified areas ("Identified Areas") at nineteen station sites in Pennsylvania (the "Pennsylvania Sites") subject to a unilateral administrative order issued by the Department of Environmental Resources ("Department") to Texas Eastern on or about March 15, 1988, entitled "Disposal Area Assessment and Remediation Order" ("Order"). The investigation and characterization of Identified Areas is being conducted in accordance with the "Detailed Plan for the Investigation of Identified Areas at Texas Eastern's Pennsylvania sites (Revised)" ("Plan") which the Department approved by letter dated August 10, 1988. Moreover, as agreed to by the Department, Texas Eastern is carrying out the assessment of Identified Areas in three discrete phases. The purpose of this letter is to summarize the work that has taken place to date under the approved Plan and to apprise the Department of upcoming assessment activities in connection with the investigation and characterization of Identified Areas at the Pennsylvania Sites.

Phase I of the Identified Area Program

The Phase I assessment of Identified Areas at the Pennsylvania sites (referred to as the "Initial Phase of Identified Area Sampling") has consisted of investigation and characterization of pipeline liquids areas, chromate coolant areas, hydraulic fluids areas and tentatively identified areas. Because the field work associated with these assessment activities has primarily involved installing soil borings within and adjacent to the categories of Identified Areas listed below, it was performed as a single phase.

The Identified Areas investigated and characterized during Phase I of Texas Eastern's assessment program are located at the following fourteen (14) sites.

Wind Ridge (20) Holbrook Perulack

Connellsville (21A) Delmont Shermans Dale

Bedford (22A) Armagh Grantville

Marietta (24A) Lilly Bechtelsville

Eagle (25) Entriken

Along with carrying out Phase I of the Identified Area investigation, Texas Eastern voluntarily gathered additional subsurface soil information through soil borings at the above listed sites in accordance with letters to the Department dated May 25, 1988, and November 10, 1988. This information and the results of Phase I of the Identified Area assessment work are being submitted to the Department in site specific reports. At this time, thirteen (13) reports have been submitted to the Department and Texas Eastern anticipates that the one (1) remaining report (Entriken) will be submitted to the Department by the end of this month.

Phase II of the Identified Area Program

Phase II of the assessment of Identified Areas at the Pennsylvania Sites (referred to as the "Pilot Phase of Identified Area Sampling") involves the investigation and characterization of representative fire fighting depressions, trash areas and brush areas to evaluate and refine as necessary the assessment procedures set forth in the Plan. The Department and Texas Eastern agreed on the necessity of the Pilot Phase because prior assessment work at the Pennsylvania Sites has not investigated fire fighting depressions, trash areas and brush areas. The general assessment approaches and requirements that Texas Eastern will follow in connection with this phase of its investigative activities were presented in the approved Plan and are summarized in Tables 1, 2 and 3, appended to this letter. As part of this second phase of its investigation of Identified Areas, Texas Eastern intends (1) to implement the assessment approaches summarized in Tables 1, 2 and 3 at selected Identified Areas, (2) to evaluate the effectiveness of such approaches, (3) to prepare a report summarizing the results of the Pilot Phase investigation, (4) to modify or refine its assessment approaches as necessary, and (5) to meet with the Department to discuss the results of the Pilot Phase investigation prior to proceeding with the third phase of the Identified Area investigation.

At the present time, Texas Eastern plans to assess the following Identified Areas during the Pilot phase of the Identified Area investigation.

- o Firefighting Depression Area Bedford (22A)
- o Trash Areas Grantville
 Chambersburg (23)
 Holbrook
 Entriken
- o Brush Area Entriken

This list reflects the substitution of certain sites and Identified Areas that Texas Eastern and the Department agreed to at a meeting on April 11, 1989. Specifically, Texas Eastern and the Department agreed that a trash area at Grantville would be substituted for a trash area at Bernville and that the brush area at Entriken would be substituted for the Brush area at Bernville. In addition, we are requesting a trash area at Entriken be substituted for a trash area at Uniontown (21). The Entriken trash area substitution is in response to the Department's letter of July 10, 1989, requesting additional characterization work to be performed in this area of the Entriken site. Accordingly, the Pilot Phase work is proposed to occur at the above listed site locations.

Table 4 attached hereto presents a summary by site of Identified Areas to be investigated during the Pilot Phase. In addition, this table includes information on original dimensions, approximate historic bottom depths, estimated depths to bedrock, numbers of borings and estimated numbers of samples for each Identified Area. Depths to bedrock are estimated based upon previous subsurface work performed at the respective sites. Depths of borings and numbers of samples are estimated based on the difference between approximate historic bottom depths and estimated depths to bedrock.

Table 5 attached hereto is a non-binding schedule detailing the expected duration of the Pilot Phase of Texas Eastern's Identified Area investigation. Texas Eastern intends to begin the Pilot Phase when all Phase I Identified Area reports have been submitted to the Department (currently scheduled for late August, 1989).

Phase III of the Identified Area Program

Phase III of the assessment of Identified Areas at the Pennsylvania Sites will involve the investigation and characterization of those remaining fire fighting depressions, trash areas and brush areas not assessed during the Pilot Phase. The characterization approaches and requirements that will be followed during this third phase are discussed in the approved Plan. These approaches and requirements may be modified or refined. During the evaluation of the results from the Pilot Phase, if necessary, changes will be made to improve the effectiveness and/or efficiency of the Program.

Phase III of the assessment of Identified Areas is expected to begin after a final report of the Pilot Phase has been submitted to the Department, any appropriate modifications or refinements of the characterization approaches set forth in the Plan are made, and discussions with the Department are completed.

If the Department has any questions concerning the above described Identified Area assessment program, please let us know.

Sincerely,
R. A. Riess

RAR/MRH/njc

TABLE 1

Approach for Characterizing a Firefighting Depression Area

Activity	Scope of Work
Soil Characterization	
Sampling:	
Sample Locations	One soil boring inside the Identified Area.
	One soil boring outside and downslope of the Identified Area.
Sample Depth	25 feet, refusal, or water table.
Type of Samples	One composite sample for each 2-ft interval, over total depth of the soil borings.
Analysis:	borings.
PCBs	All composite samples.
HSL	Upper and lower composite samples from each soil boring.
CDD/CDF	Not applicable.
Groundwater Characterization	
Well Installation	Depending on soil data and/or existence of equivalent wells, four wells (maximum) per Identified Area, as required.
	Subsequent wells dependent on groundwater data.
Sampling	Four rounds (minimum per well, quarterly basis.
Analysis	Selected HSL substances ² .

Upper is a sample obtained from the 2-foot interval at, or just above, the historical bottom of the Identified Area; lower is a sample obtained from the bottom 2-foot interval of the soil boring.

 $^{^{2}}$ Selected substances based on data obtained through the soil boring program.

Approach for Characterizing a Trash Area

Acti	vi	ty
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Scope of Work

: -g:

Soil Characterization

Sample Locations

Two backhoe trenches inside of each trash area to historical bottom of each trash area (maximum length of 25 feet).

Up to five soil borings within trenches.

One soil boring outside and downslope of historical boundary of each trash area.

Sampling Depth

Historical bottom of each trash area plus 10 ft (maximum 25 feet) refusal,

or water table.

Type of Samples

Up to a total of five locations in the two trenches. One discrete sample at the historical bottom of each trash area at each location.

One composite sample for each 2-ft interval, over total depth of each soil

boring.

Analysis:

PCBs

All samples.

HSL

Lower¹ composite sample from each soil boring in the trenches.

Upper and lower² composite samples from

the outside soil boring.

CDD/CDF

Not applicable.

Groundwater Characterization

Well Installation

Depending on soil data and/or existence of equivalent wells, four wells (maximum) per trash area, as required.

Subsequent wells dependent on groundwater data.

TABLE 2 (continued)

Activity	Scope of Work
Sampling	Four rounds (minimum) per well, quarterly basis.

 $^{^{1}}$ Lower is a sample obtained from the bottom 2-foot interval of the soil boring.

Upper is a sample obtained from the 2-foot interval at, or just above, the historical bottom of the trash area; lower is a sample obtained from the bottom 2-foot interval of the soil boring.

 $^{^{3}}$ Selected substances based on data obtained through the soil boring program.

TABLE 3

Approach for Characterizing a Brush Area

Activity	Scope of Work
Soil Characterization	
Sampling:	
Sample Locations	One backhoe-excavated investigation area inside each brush area.
Sampling Depth	Historical bottom of each brush area plus 10 ft (maximum 25 ft), refusal, or water table.
Types of Samples	Not applicable. Visual observation only.
Analysis:	
PCBs	Not applicable.
HSL	Not applicable.
CDD/CDF	Not applicable.
Groundwater Characterization	
	Not applicable.

TABLE 4

Summary of Identified Area Information

Site	Type of Ident. Area	Ident. Area I.D. Number	Dimensions (ft.)	Historic Bottom Depth (ft.)	to Bedrock	Numb bor	er of ings Out(3)	Numbe samp PCB	r of (4) les <u>HSL</u>
Bedford	Firefighting	PA-22A-FF	10 Diameter	8	25	1	1	37	6
Chambersburg	Trash	PA-23-02	30 X 40	5(4)	10	5	1	33	10
Grantville	Trash	PA-GRA-04	10 X 60	5(4)	10	5	1	33	10
Holbrook	Trash	PA-HOL-04	15 X 100	10	25	5	1	76	10
Entriken	Trash	PA-ENT-02	15 X 10	5(4)	10	5	1	33	10
Entriken	Brush	PA-ENT-03	12 Diameter	3	10	0	0	0	0

⁽¹⁾ Estimated based on previous investigations

⁽²⁾ Within the trench

⁽³⁾ Outside the area historical boundary

⁽⁴⁾ Estimated

TABLE 5
Schedule for Phase II Investigations

Activity	Duration (weeks)	Elapsed Time (weeks)		
Mobilization, Planning Surveying Locations	3	3		
Field Work	5	8		
Receipt of Analyses	6	14		
Draft Report	2	16		
Review of Report	2	18		
Final Report	2	20		
Meeting with Department	3	23		

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WEST CHESTER, PA 19380 MAR 1 6 1988 PHONE: 215-692-3030

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Assistant Director's Office BUREAU OF WASTE MGT.

March 17, 1988

Mr. James P. Snyder, Acting Director Bureau of Waste Management Pennsylvania Dept. of Environmental Resources Fulton Building, Eighth Floor 3rd & Locust Streets P.O. Box 2063 Harrisburg, PA 17120

Texas Eastern Transmission Corporation and Texas Eastern Gas Pipeline Company; Consent Order and Agreement Dated April 1, 1987; Groundwater Quality Data File No. PA-415070045

Dear Mr. Snyder:

Enclosed please find one copy of the groundwater quality data associated with samples taken from Phase I monitoring wells MW-01, MW-02 and MW-03 at the Rockwood site. The samples represent initial sampling of the Phase I wells.

These groundwater quality data are submitted on behalf of Texas Eastern and in accordance with the requirements of Paragraph 7 of the April 1, 1987 Consent Order and Agreement.

Very truly yours,

ROY F. WESTON, INC.

(Ard)

PEXAS EASTERN

ROCKWOOD. PENNSYLVANIA

GROUND WATER IV

ANALYTICAL DATA REPORT

Batch Numbers: 8801-256

Sample Dates: January 19, 1988

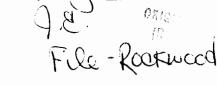
Site Ident: P6 (022)

Media : GROUND WATER

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GW4 BATCH NUMBER 8801-256

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MW03-A01		0040	***] - 34-34-34 - - 34-34-34 -		
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WESTON WAY WEST CHESTER, PA 19380 PHONE: 215-692-3030 TELEX: 83-5348

June 10, 1988



Mr. James P. Snyder, Director Bureau of Waste Management Pennsylvania Dept. of Environmental Resources Fulton Building, Eighth Floor 3rd & Locust Streets P.O. Box 2063 Harrisburg, PA 17120

RE: Texas Eastern Transmission Corporation and Texas Eastern Gas Pipeline Company; Consent Order and Agreement Dated April 1, 1987; Groundwater Quality Data

Dear Mr. Snyder:

Enclosed please find one copy of the groundwater quality data associated with samples taken from first phase monitoring wells at the Rockwood site.

The samples represent quarterly sampling of Phase I groundwater monitoring wells MW-01, MW-02 and MW-03. In addition, a grab sample was collected from seep SP-01.

These groundwater quality data are submitted on behalf of Texas Eastern and in accordance with the requirements of Paragraph's 7 and 11 of the April 1, 1987 Consent Order and Agreement.

Very truly yours,

ROY F. WESTON, INC.

TEXAS EASTERN

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ROCKWOOD, PENNSYLVANIA

GROUND WATER V

ANALYTICAL DATA REPORT

Batch Numbers: 8804-154

Sample Dates: April 18, 1988

Site Ident: P6 (022)

Media: GROUND WATER

GROUNDWATER SAMPLE/TYPE CODES

LAST TWO DIGITS OF SAMPLE ID NUMBER	DESCRIPTION
01	Normal or Routine Sample
02	Duplicate
03	Sampling Equipment Field Blank
04	Trip Blank
05	Decontamination Water (potable quality before use)
09	Prepurge sample from top of water column
10	Purge Pump DI Rinse Blank
19	Post purge sample from top of water column
20	Triplicate

KHF/bk
te5\idcodes.
Revised 5/31/88

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! MW03-B02 !! W ! !:	{ <u></u> {									ł
! MW03-B20 !! W ! !!!! ! SP01-A01 !! W !	: 0080	 ++	++	++		;	;			: